

KEVIN V. RYAN (CSBN 118321)
United States Attorney

EUMI L. CHOI (WVBN 0722)
Acting Chief, Criminal Division

PHILIP J. KEARNEY (CSBN 114978)
RICHARD J. CUTLER (CSBN 146180)
Assistant United States Attorney

450 Golden Gate Avenue
San Francisco, California 94102
Telephone: (415) 436-6867
Fax: (415) 436-6753
Email: richard.cutler@usdoj.gov

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	Criminal No. CR 05-00383 PJH
)	
Plaintiff,)	
)	
)	STIPULATION AND [PROPOSED]
)	ORDER EXCLUDING TIME
v.)	
)	
LONNIE WILLIAMS,)	
)	
Defendant.)	

The above-captioned matter came before the Court on April 6, 2006, to hear an Emergency Motion to Continue Trial Date filed by defendant. The defendant, Lonnie Williams, who was present, was represented by Mark Rosenbush, Esq., and the government was represented by Richard J. Cutler, Assistant United States Attorney.

The court heard argument concerning the motion to continue. Defendant requested more time to allow him to inspect the discovery that had been produced on April 5, 2006 and to employ an expert to examine the firearm in light of the information contained in

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the new discovery. After argument, the court granted defendant's motion to continue the trial date and the court set the trial for Monday, May 22, 2006, at 8:30 a.m., with a pretrial conference set for May 12, 2006, at 10:00 a.m. Additionally, the court set May 12, 2006, as the date to decide any additional motions filed by the parties. Pursuant to instructions from the court, the parties have met and conferred and the following schedule for motions has been set:

April 21, 2006	Motions
April 28, 2006	Responses
May 3, 2006	Replies
May 12, 2006	Hearing

The parties agree and stipulate that the time from April 10, 2006, until and through May 22, 2006, is appropriate and necessary for defendant to prepare and file motions and to conduct effective trial preparation in light of the recently disclosed discovery, taking into account the exercise of due diligence, under 18 U.S.C. § 3161(8)(B)(iv), and that time should therefore be excluded from the seventy-day speedy trial calculation because the ends of justice served by this continuance outweigh the best interest of the public and the defendant in a speedy trial.

DATED: 4/6/06

/S/
 MARK ROSENBUSH, ESQ.
 Counsel for DEFENDANT
 LONNIE WILLIAMS

DATED: 4/6/06

/S/
 RICHARD J. CUTLER
 Assistant United States Attorney

SO ORDERED.

DATED: 4/10/06

HONORABLE HAMILTON
 UNITED STATES JUDGE



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